

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT SYSTEMS
ANTITRUST LITIGATION

This Document Relates to All Cases

MDL No. 2817
Case No. 18 C 864

Hon. Robert M. Dow, Jr.
Magistrate Judge Jeffery T. Gilbert

MDL PLAINTIFFS' MOTION TO SEAL THEIR OMNIBUS MOTION TO COMPEL

MDL Plaintiffs respectfully request leave to file under seal certain documents accompanying their Omnibus Motion to Compel ("Motion"). MDL Plaintiffs' brief in support of the Motion and certain exhibits attached thereto include information from documents that Defendants have designated as "Confidential" or "Highly Confidential," and the MDL Plaintiffs therefore seek leave to file them under seal. MDL Plaintiffs will also file a public, redacted version of the Motion.

MDL Plaintiffs file this motion without prejudice to their ability challenge Defendants' improper use of the Confidential and Highly Confidential designations for documents that are not proprietary and do not contain trade secrets.

Dated: August 6, 2018

/s/ Peggy J. Wedgworth

Peggy J. Wedgworth

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Derek T. Ho, an attorney, hereby certify that on August 6, 2018, I caused a true and correct copy of the foregoing **MDL PLAINTIFFS' MOTION TO SEAL THEIR OMNIBUS MOTION TO COMPEL** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by email to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Derek T. Ho

Derek T. Ho

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